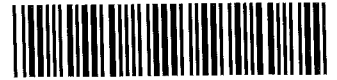


U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Lindsay Light II OU14 - Removal Polrep

US EPA RECORDS CENTER REGION 5



467186



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:**

POLREP #2  
Lindsay Light II OU14  
05YT  
Chicago, IL

**To:**

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**From:** Verneta Simon, on-scene coordinator  
**Date:** 9/16/2014  
**Reporting Period:**

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	05YT	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/14/2014
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	7/2/2014	<b>Start Date:</b>	7/2/2014
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	0000002212	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Development of 44-story high-rise on thorium-contaminated property

#### 1.1.2 Site Description

This OU 14 property is 1.25 acres. The Rehabilitation Institute of Chicago (RIC) previously owned the OU 14 property and traded the OU 14 property to Golub, the current OU 14 property owner, for the OU 15 property located at 630 N. McClurg.

##### 1.1.2.1 Location

545 North McClurg Court, Chicago, Illinois

##### 1.1.2.2 Description of Threat

Elevated gamma radiation readings were detected in the subsurface soils at this location on or about June 12, 2014. The PRP's analytical results for two subsurface samples were 9.1 picoCuries per gram (pCi/g) and 170,000 pCi/g (from discovered "radium" rock). The 170,000 pCi/g "rock" sample was transferred to USEPA, who in turn transferred the sample to Argonne National Lab for forensics. The forensics report is now available and is posted in the "Documents" section.

The Streeterville clean-up criterion, established in the 1990's, is 7.1 pCi/g total Ra (Ra-226 + Ra-228).

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On June 12, 2014, the environmental consultant hired by Golub, GaiaTech, and GaiaTech's subcontractor, Radiation Safety Services, Inc. (RSSI), started radiological screening of this property. GaiaTech notified USEPA via e-mail on June 13, 2014, regarding elevated gamma and preliminary sample results indicating the Streeterville clean-up criterion had been exceeded.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

#### 2.1.2 Response Actions to Date

Since July 2, 2014, GaiaTech excavated and bagged thorium-contaminated soils. As of August 20, 2014, GaiaTech shipped 27 cubic yards of thorium-contaminated soil to U.S. Ecology, Robstown, Texas. They have also remediated one 500-gal UST and encountered asbestos containing lantern mantle string ties believed to be associated with Lindsay Light Company manufacturing. Because GaiaTech encountered asbestos, they prepared and submitted required notification forms and associated fees to the City of Chicago, Cook County, and the Illinois EPA.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

On June 30, 2014, USEPA and Golub (AKA GHB-630 LLC) executed an ASAO that requires Golub to excavate and remediate thorium-contaminated soils they encounter above the 7.1 pCi/g clean-up level. Golub also agreed to pay USEPA response costs and record an institutional control requiring radiation monitoring of any part of the property that Golub does not investigate or monitor during this construction work. A copy of the executed ASAO is posted in the "Documents" section.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Thorium-contaminated	soil	27 cubic yards	See PRP Progress Report	N/A	U.S. Ecology, Robstown, TX

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

The recent forensics report from Argonne indicates that the "rock" sample has a Ra-226 concentration of 43,800 pCi/g, and the soil debris surrounding the rock has a uranium mass concentration of 2.33E+03 ug/g (2,330 ppm). According to the 2013 USGS study *Geochemical and Mineralogical Data for Soils of the Conterminous United States* (<http://pubs.usgs.gov/ds/801/>), background soil in Illinois has an average uranium concentration of 2.75 mg/kg (2.75 ppm) in the top 5 cm of surface

soil. USEPA will now have Argonne analyze previously collected samples for total uranium, total thorium, and rare earths associated with monazite and other ores. We might also have Argonne use their library and conduct research on ores and the possible origin of the rock and debris.

#### **2.2.1.1 Planned Response Activities**

USEPA will allow the PRP to suspend monthly progress reports until screening is needed.

#### **2.2.1.2 Next Steps**

A notice of completion letter will be issued once USEPA reviews and approves GaiaTech's final report. According to the terms of the ASAOC, the final report is due within 60 days of completing the removal work.

#### **2.2.2 Issues**

Not Applicable

### **2.3 Logistics Section**

Not applicable

### **2.4 Finance Section**

#### **2.4.1 Narrative**

Not applicable

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

Not applicable

#### **2.5.2 Liaison Officer**

Not applicable

#### **2.5.3 Information Officer**

Not applicable

#### **2.5.4 Community Involvement Coordinator**

Susan Pastor is the USEPA Community Involvement Coordinator (CIC).

## **3. Participating Entities**

### **3.1 Unified Command**

Not applicable

### **3.2 Cooperating Agencies**

Not applicable

**4. Personnel On Site**

Not applicable

**5. Definition of Terms**

OSC - On-Scene Coordinator

USEPA - United States Environmental Protection Agency

ASAO - Administrative Settlement Agreement on Consent

UST - Underground Storage Tank

**6. Additional sources of information**

**6.1 Internet location of additional information/report**

For additional information, please refer to "Documents" on [www.epaosc.org/](http://www.epaosc.org/)

**6.2 Reporting Schedule**

No information available at this time

**7. Situational Reference Materials**

No information available at this time